

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

v.

Amy Colburn, et al.,

Defendants.

Case No. 19-CR-10080-NMG

**MOTION SEEKING ENTRY OF ORDER  
REQUIRING APPEARANCE OF COUNSEL**

Defendant I-Hsin “Joey” Chen respectfully moves this Court to enter the attached Proposed Order, requiring his counsel, Jennifer L. Keller, to appear for trial on January 11, 2022, and continuing thereafter until the conclusion of the trial in this matter.

On June 15, 2021, this Court ordered that Defendants Amy Colburn, Gregory Colburn, and I-Hsin Chen shall stand trial in the matter of *United States v. Colburn et al.* Criminal Action No. 19-10080-NMG, on January 11, 2022, in the District Court for the Federal District of Massachusetts.

Mr. Chen’s counsel, Ms. Keller, had a prior civil trial scheduled in Superior Court in California in and for the County of Orange. That trial was set to begin on January 3, 2022, and expected to last at least three weeks. Counsel advised the Court of this conflict during the June 15, 2021 conference. The Court stated this criminal matter, which is over two years old, took precedence over a civil trial. As discussed

at the conference, Mr. Chen's counsel has prepared this proposed order requiring Ms. Keller's appearance for this trial so as to resolve the conflict in her trial schedule.

WHEREFORE Mr. Chen respectfully requests that the Court entered the attached Proposed Order.

Dated: July 15, 2021

Respectfully submitted,

/s/ Reuben Camper Cahn  
Reuben Camper Cahn (*pro hac vice*)  
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**CERTIFICATE OF SERVICE**

In accordance with Local Rule 5.2(b), I, Reuben Camper Cahn, hereby certify that on July 15, 2021 this document filed through the ECF system will be sent electronically to the registered participants as identified in the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Reuben Camper Cahn  
Reuben Camper Cahn